

### **Response to Response to Arguments**

Applicant does not concede the propriety of the rejections, or the Office's comments. Nevertheless, in the interest of expediting prosecution of the subject application, claims have been amended as indicated above. Applicant reserves its right to further argue against the Office's comments.

### **Summary of the Office Action**

Claims 18, 19, 22, 24, 26, and 28 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,463,457 to Armentrout et al. ("Armentrout") in view of U.S. Patent No. 7,134,073 to Fiedorowicz et al. ("Fiedorowicz").

Claims 20, 21, 25, 30-34, 36-38, 40, and 41 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Armentrout in view of Fiedorowicz and further in view of U.S. Patent No. 6,112,225 to Kraft et al. ("Kraft").

Applicant makes no representation that cited references are prior art. This response and any remarks or comments included herein are not intended to be, and are not to be interpreted as, an admission that any cited references are prior art. Applicant reserves the right to dispose of any cited reference under 35 U.S.C. § 102 and/or 35 U.S.C. § 103, including but not limited to antedating any one or more of the cited references.

### **The Claims**

As discussed above, claims 18 and 30 have been amended to further clarify the claimed subject matter and in light of the examiner interview. Applicant understood Examiner Cox to consider claims 18 and 30, as amended, to be allowable over the references of record. Furthermore, Applicant respectfully submits that the references of record do not disclose, teach, or in any way suggest the subject matter of claim 18 or claim 30 as amended.

For example, Armentrout does not describe “sending to a massively parallel distributed network (MPDN) server *a type of the requesting device, an identity of the requesting device, the requested data, and a type of the data conversion*”, as recited in amended claim 18. For example, Armentrout clearly does not teach “sending to a *massively parallel distributed network (MPDN) server* a type of the requesting device, an identity of the requesting device, the requested data, and a type of the data conversion. Furthermore, even assuming arguendo that Armentrout describes sending *information*, Armentrout does not disclose, teach, or in any way suggest sending “*a type of the requesting device, an identity of the requesting device, the requested data, and a type of the data conversion*”, as recited in claim 18 as amended. To this extent, Fiedorowicz adds nothing of significance.

Furthermore, the Office relies on Fiedorowicz as describing “one or more client systems” with the ability to “complete the data conversion of the requested data”. However, while Fiedorowicz describes creating a “composite style sheet”, Fiedorowicz describes that such “composite style sheet” is created at a server (*see Fiedorowicz*, abstract and column 8, lines 19-27). Therefore, Fiedorowicz does not complete a data conversion by “one or more client systems”. Furthermore, Fiedorowicz does not disclose, teach, or in any way suggest receiving “*a type of the requesting device, an identity of the requesting device, the requested data, and a type of the data conversion*”. Accordingly, Fiedorowicz simply cannot disclose, teach, or in any way suggest the “one or more client systems to complete the data conversion of the requested data”, as recited in claim 18. To this extent, Armentrout adds nothing of significance.

With regards to claim 30, Armentrout does not disclose, teach, or in any way suggest “receive *a request generated by a requesting device for a data conversion of requested data, the request comprising a type of the requesting device, an identity of the requesting device, the requested data, and a type of the data conversion*” or “distribute the partitioned data workloads, *the type of the*

*requesting device, the identity of the requesting device, and the type of the data conversion* to the distributed devices to complete *the* data conversion of the *requested* data”, as recited in claim 30 as amended. To this extent, neither Fiedorowicz nor Kraft add anything of significance.

Accordingly, for any of the reasons discussed above, the combination of Armentrout and Fiedorowicz does not support a 35 U.S.C. § 103 rejection of claim 18 as amended. In addition, the combination of Armentrout, Fiedorowicz, and Kraft does not support a 35 U.S.C. § 103 rejection of claim 30 as amended. Accordingly, Applicant respectfully requests that the Office reconsider and withdraw the rejections of claims 18 and 30.

Claims 19-22, 24-26 and 28 depend from claim 18, thus the comments directed above to claim 18 apply equally to claims 19-22, 24-26 and 28. These claims also recite certain features which, in combination with those recited in claim 18, are neither disclosed nor suggested in the references of record.

Claims 31-34, 36-38, 40, and 41 depend from claim 30, thus the comments directed above to claim 30 apply equally to claims 31-34, 36-38, 40, and 41. These claims also recite certain features which, in combination with those recited in claim 30, are neither disclosed nor suggested in the references of record.

### Conclusion

The Office's rejections of the claims have been traversed for the reasons set forth above. Accordingly, Applicant requests that the Office issue a Notice of Allowability. If the Office's next anticipated action is to be anything other than issuance of a Notice of Allowability, Applicant respectfully requests a telephone call for the purpose of scheduling an interview.

Respectfully Submitted,

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